

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:
	:
v.	:
	: No. S8 15 Cr. 536 (PGG)
KALEIL ISAZA TUZMAN, OMAR	:
AMANAT, and IRFAN AMANAT,	:
	:
Defendants.	:
	:
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DEFENDANT KALEIL ISAZA TUZMAN'S NOTICE OF PRETRIAL MOTIONS

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law, as well as the Declaration of Silvia L. Serpe and the exhibits thereto, Kaleil Isaza Tuzman respectfully moves this Court before the Honorable Paul G. Gardephe, United States District Judge, Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, for an order: (1) dismissing the S8 Indictment and requiring the government to proceed on the conspiracy counts in the S1 Indictment on which Mr. Isaza Tuzman was extradited, or, alternatively, striking the offending allegations from the S8 Indictment; (2) severing Mr. Isaza Tuzman's trial from the trial of the Amanats; (3) directing the government to serve a limited bill of particulars; (4) directing the government to disclose its Rule 404(b) evidence no later than 60 days prior to trial; (5) directing the government to produce 3500 material no later than 60 days prior to trial; (6) directing the government to identify its trial exhibits no later than 60 days prior to trial; (7) directing the government to identify the witnesses it will call at trial no later than 60 days prior to trial; (8) directing the government to promptly disclose and identify all *Brady* and *Giglio* material; and (9) permitting Mr. Isaza Tuzman to join in his co-defendants' motions and to file additional motions, as appropriate.

PLEASE TAKE FURTHER NOTICE THAT, pursuant to the Court's January 20, 2017 scheduling order (Dkt. #224), the government's opposition papers are due on April 21, 2017, and

Mr. Isaza Tuzman's reply is due on May 5, 2017.

Dated: March 31, 2017
New York, New York

/s/ Silvia L. Serpe
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